

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	*	CHAPTER 13
ROBERT & PATRICIA WILLIAMS	*	BANKRUPTCY NO. 18-15270
	*	
Debtors	*	

**ORDER**

AND NOW, this        day of        , 201 , upon  
consideration of NewRez LLC d/b/a Shellpoint Mortgage Servicing's  
Motion for Relief from the Automatic Stay and Debtors' answer  
thereto, and after hearing, it is hereby ORDERED and DECREED  
that;

The Motion of NewRez LLC d/b/a Shellpoint Mortgage Servicing  
for Relief From The Automatic Stay Under Section 362 is DENIED.

BY THE COURT:

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J.

Kenneth G. Harrison, Esquire  
Fine Neshaminy Interplex Suite 115  
Trevose, PA 19053

William C. Miller, Esquire (Trustee)  
P.O. Box 40119  
Philadelphia, PA 19106

Lorraine Gazzaza Doyle, Esquire  
Pincus Law Group  
425 RXR Plaza  
Uniondale, NY 11556

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**DEBTORS' ANSWER TO THE MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

Debtors, Robert & Patricia Williams, by and through their attorney, Kenneth G. Harrison, Esquire, respectfully represents as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied as stated. Debtors have made portgage payments since the filing of this bankruptcy. Debtors have no knowledge if the amount stated in this Motion is correct and strict proof thereof is demanded at trial.
7. Denied. Debtors have no knowledge of the unpaid principal balance or what additional charges, if any, will be charges by Movant.
8. Denied. Debtors have no knowledge of Movant's attorney's fees and costs in this matter.
9. Admitted in that the writing of the statute speaks for itself.
11. Denied as a conclusion of law upon which no responsive

pleading is required.

12. Denied as a conclusion of law upon which no responsive pleading is required.

13. Denied as a conclusion of law upon which no responsive pleading is required.

14. Admitted.

#### DEFENSES

1. The Debtors have substantial equity in their property and movant has been afforded adequate protection of its interest.

2. Movant has not shown the irreparable harm necessary to justify lifting of the automatic stay with respect to its foreclosure.

3. If movant is entitled to relief from the stay, the stay should not be terminated and the Court should grant less drastic relief by conditioning or modifying the stay.

WHEREFORE, Debtors, Robert & Patricia Williams, respectfully requests that this Honorable Court deny Movant's Motion for Relief From the Automatic Stay.

Respectfully submitted,

s/s Kenneth G. Harrison  
Kenneth G. Harrison, Esquire  
Five Neshaminy Interplex Suite 115  
Trevose, PA 19053